

R&F

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF NEW YORK

2025 MAR 24 PM 3:12

In re:  
**KRIS ROGLIERI, Debtor**  
Chapter 7 Case No. 24-10157-REL

CLERK OF THE  
BANKRUPTCY COURT  
N.D. OF NY  
ALBANY

**MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO  
TRUSTEE REMOVAL OPPOSITION (Dkt. No. 345)**

TO: The Honorable Robert E. Littlefield, Jr.,  
United States Bankruptcy Judge:

I, Kris D. Roglieri, by and through my Attorney-in-Fact, Linda Oliver, respectfully request a 7-day extension to file my response regarding the Motion to Remove Chapter 7 Trustee Christian Dribusch (Dkt. No. 345).

The deadline to submit my response is **Friday, March 28, 2025**. Due to my current incarceration, I have extremely limited access to legal resources, documents, and communication, which has delayed my ability to finalize and properly prepare my reply.

I am making every effort to comply with the Court's orders and to respond thoroughly and respectfully. I believe a brief extension of **seven (7) days through Friday, April 4, 2025**, will allow sufficient time to complete my response under the circumstances.

This request is made in good faith and not for the purpose of delay. I respectfully ask the Court to grant this short extension so that I may fully address the issues before the Court.

**Dated: March 25, 2025,**  
Respectfully submitted,  
**Kris D. Roglieri**  
By: **Linda Oliver, Attorney-in-Fact**  
N-4 #45131  
Rensselaer County Jail  
4000 Main Street  
Troy, NY 12180



**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF NEW YORK**

**In re:  
KRIS ROGLIERI, Debtor  
Chapter 7 Case No. 24-10157-REL**

**CERTIFICATE OF SERVICE**

I, Linda Oliver, as Attorney-in-Fact for Kris D. Roglieri, hereby certify that on **March 22, 2025**, I caused a true and correct copy of the **Motion for Extension to File Response to Trustee's Opposition (Dkt. No. 345)**, to be served via U.S. Mail, First-Class, Postage Prepaid, upon the following parties:

**Via U.S. Mail, First-Class, Postage Prepaid:**

- **Honorable Robert E. Littlefield, Jr.**  
United States Bankruptcy Court  
Northern District of New York  
445 Broadway  
Albany, NY 12207
- **Clerk of the United States Bankruptcy Court**  
United States Bankruptcy Court  
Northern District of New York  
445 Broadway, Suite 330  
Albany, NY 12207
- **Christian Dribusch, Chapter 7 Trustee**  
Dribusch Law Firm  
187 Wolf Road, Suite 300-020  
Albany, NY 12205
- **United States Trustee's Office**  
Lisa M. Penpraze, Assistant U.S. Trustee  
Leo W. O'Brien Federal Building  
11A Clinton Avenue, Room 620  
Albany, NY 12207

I certify under penalty of perjury under the laws of the United States that the foregoing is true and correct.

**Date:** March 22, 2025,  
**Respectfully submitted,**  
**KRIS D. ROGLIERI**  
**By: Linda Oliver, as Attorney-in-Fact**  
N-4 #45131  
Rensselaer County Jail  
4000 Main Street  
Troy, NY 12180

A handwritten signature in black ink, appearing to be 'L. Oliver', written over a horizontal line.